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Portland, OR 97213

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OREGON OPERATIONS OFFICE

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EPA-REGION 10

U.S. EPA
ATTN: Harbor Comments
805 SW Broadway, Suite 500
Portland, OR 97205

I have lived in Portland for over 35 years. I am recently retired, but I worked at a chemical plant near the Willamette River, so I am aware of the current Superfund Site issue on the portion of the river that runs through downtown Portland. These 10 miles were designated a Superfund Site back in 2000, which put the Environmental Protection Agency in charge of studying the contamination of the river there and figuring out a plan to clean it up.

While I am certainly in favor of cleaning up the hazardous substances and making sure the river is safe for everyone, I have concerns about the plan the EPA just proposed in June 2016 to accomplish this. It calls for dredging up 167 acres of sediment and removing 1.9 million cubic yards to a landfill at a cost that could exceed \$1 billion. This will prove very expensive to local residents who will see higher taxes and utility rates and especially impact those like me who are now living on limited or fixed incomes. But apart from the cost, the plan will cause many other problems. It will reverse the natural restoration process of the river that's been going on for years, dredging up toxic substances that have been buried and that are now in the process of being mitigated naturally.

I don't see how dredging to this extent can do anything but cause problems. It's like working with asbestos. If I have an old asbestos floor in my house, I have options. I can pull it completely out, tape off the entire house and wear a respirator. Or, I can cover it up with something else and entomb it. For the Willamette, there has to be something better than dredging. Having been a chemical worker, I know how to protect myself when working with hazardous substances. The people I'd worry about are those who like to swim or fish in the river and may not know how to protect themselves. The EPA's current plan will create ongoing noise and often close the river to many activities for the term of the cleanup. They estimate seven years, but it could take much, much longer, seriously affecting our local businesses. It's hard for me to imagine what would happen if the river were closed down. So many people recreate there, and there are so many popular community activities like the Dragon Boat races. To shut it down like that doesn't seem reasonable.

This plan is based on data that is over a decade old. While I'm sure that much of the information is valid, it's been a long time since it was gathered, and it needs to be re-evaluated before decisions are made that will impact those of us who live in Portland. This is a much more intense cleanup than what the EPA has recommended for other Superfund Sites, and that doesn't seem fair. The Army Corps of Engineers, which I know is highly qualified in such matters, has suggested a less aggressive approach, and I believe that would be best. Please reconsider the current cleanup plan and develop one that both cleans up the Willamette River and doesn't hurt those of us who live and work near it.

Sincerely,

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